

Sills Cummis & Gross

A Professional Corporation
The Legal Center
One Riverfront Plaza
Newark, New Jersey 07102
Tel: (973) 643-7000
Fax (973) 643-6500

Andrew H. Sherman
Member
Admitted In NJ, NY
Direct Dial: 973-643-6982
Email: asherman@sillscummis.com

February 13, 2025

BY CM/ECF

The Honorable J. Kate Stickles
U.S. Bankruptcy Court for the District of Delaware
824 North Market Street, 3rd Floor
Wilmington, DE 19801

Re: In re: CarePoint Health Systems Inc., et al., Case No. 24-12534 (JKS)

Dear Judge Stickles:

I write on behalf of the Official Committee of Unsecured Creditors (the “Committee”) to correct a misstatement in the February 11, 2025 letter filed by CarePoint Health Captive Assurance Company, LLC and other objecting parties (collectively, the “Objecting Parties”) [Docket No. 679] regarding an alleged discovery dispute.

The Objecting Parties allege that the Committee “unequivocally refused” to produce a privilege log as required by Rule 26(b)(5)(A) of the Federal Rules of Civil Procedure. To be clear, such assertion is false as the Committee *never* refused to produce a privilege log. The Committee stated that the requested privilege log would be discussed internally, as the Committee still had a full week to analyze and respond to the Objecting Parties’ discovery requests.

As stated on the record at the hearing conducted on February 12, 2025, the Committee fully intends to comply with its discovery obligations, including producing a privilege log, in accordance with applicable rules.

Respectfully submitted,

/s/ Andrew Sherman
Andrew H. Sherman